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12 Attorneys for Defendant-Counterclaimant
FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

18 | MEDIATEK INC.,

Plaintiff,

v.

21 | FREESCALE SEMICONDUCTOR, INC.

Defendant

Case No. 4:11-cv-05341 YGR (JSC)

**[PROPOSED] ORDER GRANTING
FREESCALE'S STIPULATED
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

Hon. Jacqueline Scott Corley

1 Upon consideration of Freescale Semiconductor, Inc.'s (Freescale) Stipulated
2 Administrative Motion to File Documents Under Seal (Motion to File Under Seal), the Joint
3 Stipulation to Freescale's Motion to File Under Seal, and other supporting documents, and for
4 good cause shown, this Court hereby GRANTS Freescale's Motion to File Under Seal and
5 ORDERS that the following documents shall be sealed in whole or in part, as indicated below:

- 6 1. The portions of Freescale's Opposition to MediaTek Inc.'s Motion for
7 Leave to Amend Its Amended Disclosure of Asserted Claims &
8 Infringement Contentions (the Opposition) indicated by the redacted
9 version of Freescale's Opposition;
- 10 2. Exhibit 3 to the Declaration of Joshua A. Hartman in Support of the
11 Opposition (Hartman Declaration), which is a true and correct copy of an
12 untitled document bearing the Bates range MTK-00027275–27277;
- 13 3. Exhibit 4 to the Hartman Declaration, which is a true and correct copy of a
14 document titled "MT8130 Bus Fabric" bearing the Bates range MTK-
15 00027278–27282;
- 16 4. Exhibit 8 to the Hartman Declaration, which is a true and correct copy of
17 excerpts from a document titled "MediaTek MT8135 Application
18 Processor Datasheet," dated April 30, 2013, bearing the Bates range
19 MTK-00027283–30321;
- 20 5. Exhibit 11 to the Hartman Declaration, which is a true and correct copy of
21 an undated document titled "MTK Roadmap for Tablet Solutions,"
22 bearing the Bates range MTK-00031200–31204;
- 23 6. Exhibit 12 to the Hartman Declaration, which is a true and correct copy of
24 an undated document titled "MTK Roadmap for Tablet Solutions,"
25 bearing the Bates range MTK-00031205–31216;
- 26 7. Exhibit 13 to the Hartman Declaration, which is a true and correct copy of
27 an undated document titled "MTK MT8135 Alpha Plan," bearing the
28 Bates range MTK-00031217–31222.

8. Exhibit 14 to the Hartman Declaration, which is a true and correct copy of an undated document titled “MTK Roadmap for Tablet Solutions,” bearing the Bates range MTK-00031223–31238.
9. Exhibit 16 to the Hartman Declaration, which is a true and correct copy of excerpts from the transcript of the August 1, 2013, deposition of MediaTek 30(b)(6) witness MH Shieh.
10. Exhibit 17 to the Hartman Declaration, which is a true and correct copy of excerpts from the transcript of the August 2, 2013, deposition of MediaTek 30(b)(6) witness MH Shieh.

These documents shall be designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the terms of the Stipulated Protective Order, Docket No. 100.

Dated: September 4 , 2013

Jacqueline S. Corley
United States Magistrate Judge
Jacqueline Scott Corley